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Davis Polk

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April 19, 2022

Re: Notification Pursuant to Rule 1.12 of the New York Rules of Professional Conduct: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13 Civ. 7789 (SDNY); *Nypl et al v. JP Morgan Chase & Co. et al.*, No. 15 Civ. 9300; *Contant et al v. Bank of America Corp. et al.*, No. 17 Civ. 3139; and *Allianz Global Investors GmbH et al. v. Bank of America Corp. et al.*, No. 18 Civ. 10364.

The Hon. Lorna G. Schofield
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Dear Judge Schofield:

I write to provide notice pursuant to Rule 1.12 of the New York Rules of Professional Conduct that we are screening Your Honor's former law clerk, Corey Meyer, from any participation in our work on four matters that were pending before Your Honor during his clerkship.

Mr. Meyer was a law clerk in Your Honor's chambers from March 2021 to March 2022. He will join Davis Polk as an associate on April 25, 2022. During his clerkship, we represented clients in four matters (the "Screened Matters") before Your Honor. The Screened Matters are:

- *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13 Civ. 7789 (SDNY);
- *Nypl et al v. JP Morgan Chase & Co. et al.*, No. 15 Civ. 9300;
- *Contant et al v. Bank of America Corp. et al.*, No. 17 Civ. 3139; and
- *Allianz Global Investors GmbH et al. v. Bank of America Corp. et al.*, No. 18 Civ. 10364

We are informed that Mr. Meyer participated in your chambers' work on the Screened Matters. We will screen him from our work on those matters.

We have established screening procedures to assure that there is no flow of information between Mr. Meyer and the Davis Polk team working on a Screened Matter. All firm attorneys and legal assistants working on the Screened Matters will be instructed in writing that no person working on a Screened Matter should discuss or share with Mr. Meyer any information relating to his or her work on the Screened Matter and that they must not seek any information from Mr. Meyer. Similarly, Mr. Meyer will be instructed in writing that he is not to share any information he may have about the Screened Matters with anyone at Davis Polk. The instructions will make clear that these restrictions apply to all forms of information sharing, including but not limited to oral discussions, writings, and emails. We will also restrict the files relating to the Screened Matters so that Mr. Meyer will not be able to access them. We will send regular reminders of the establishment of this screen to all personnel working on the Screened Matters and to Mr. Meyer.

The written screen notification will provide that violations of our screening procedures may result in sanctions.

As an associate, Mr. Meyer will be paid a fixed salary, and will not be apportioned any of the fees from the Screened Matters. The determination of any associate bonus amount also will not be related in any way to fees from the Screened Matters.

Please let me know if Your Honor desires further information about the foregoing.

Respectfully submitted,


Lawrence E. Jacobs

cc: All counsel by e-filing

By Electronic Filing